

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;  
TATUNG COMPANY OF AMERICA, INC.;  
CHUNGHWA PICTURE TUBES, LTD.;  
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF  
PLAINTIFF'S MOTION TO COMPEL DEPOSITION TESTIMONY  
AND FOR SANCTIONS [D.I. 198]**

The undersigned attorney for plaintiff, LG.Philips LCD Co., Ltd. ("LPL") hereby states, pursuant to Local Rule 7.1.1, that LPL's attorneys have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in LPL's Motion to Compel Deposition Testimony and for Sanctions (the "Motion") [D.I. 198]. Specifically, counsel states the following:

(1) The Motion deals with depositions LPL is taking of defendants on an expedited basis in preparation for the trial that will commence on July 17. The Motion seeks relief as a result of defense counsel's repeated improper instructions to the deponents not to answer and repeated improper coaching of deponents through objections and interjected questions.

(2) LPL's counsel repeatedly asked defense counsel to refrain from making improper objections and from coaching the witnesses, as shown throughout the transcripts that were attached to the Motion as Exhibits 1-4. Despite repeated requests to refrain, defense counsel did not comply.

not comply.

(3) LPL's counsel informed defense counsel repeatedly that continued improper deposition behavior would require LPL to seek relief from the Court. LPL's counsel sent defense counsel written notice before the Motion was filed that LPL would be seeking relief from the Court.

May 31, 2006

THE BAYARD FIRM



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**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on May 31, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.  
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The undersigned counsel further certifies that copies of the foregoing document were sent on May 31, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

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